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June 19, 2014

Arthur Sanders, Esq. 30 South Main Street New City, New York 10956-3515

Re: Babcock, et al. vs. C.Tech Collections, Inc., et al. E.D.N.Y. Case No. 1:14-cv-03124-PKC-MDG

Dear Mr. Sanders,

As you know, I am co-counsel of record for Plaintiff, Jennifer Babcock, in the referenced matter. I enclose and serve the following documents:

- (1) Plaintiff's Notice of Motion and Motion for Class Certification or, In the Alternative, Interim Appointment of Class Counsel;
- (2) Memorandum of Law in Support of Plaintiff's Motion for Class Certification or, In the Alternative, Interim Appointment of Class Counsel;
- (3) Declaration of Andrew T. Thomasson, Esq. in Support of Plaintiff's Motion for Class Certification or, In the Alternative, Interim Appointment of Class Counsel;
- (4) Declaration of Abraham Kleinman, Esq. in Support of Plaintiff's Motion for Class Certification or, In the Alternative, Interim Appointment of Class Counsel;
- (5) Declaration of Jennifer Babcock in Support of Plaintiff's Motion for Class Certification or, In the Alternative, Interim Appointment of Class Counsel;
- (6) Proposed Order Granting Class Certification Pursuant to Fed. R. Civ. P. 23(b)(2) and 23(b)(3);
- (7) Proposed Order Appointing Interim Class Counsel Pursuant to Fed. R. Civ. P. 23(g)(3); and
- (8) Certificate of Service.

You will notice that the enclosed Notice of Motion does <u>not</u> contain a return date. Per Judge Chen's Individual Practice Rule 3.E, Parties may request oral argument by letter at the time their moving,

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opposing or reply papers are filed. The Court will determine whether argument will be heard and, if so, will advise counsel of the argument date and time.

Also, Judge Chen's Individual Practice Rule 3.C requires the Parties to set up their own briefing schedule and submit it to the Court for approval. To that end, I ask that you please call me at your earliest convenience so we may discuss, and hopefully agree upon, a mutually acceptable briefing schedule regarding Plaintiff's enclosed motion.

Finally, per Judge Chen's Individual Practice Rule 3.D, these motion papers will not be filed electronically until the motion is fully briefed. This letter is, however, being filed electronically contemporaneously with its mailing.

Thanks in advance for your courtesies and anticipated prompt attention to this matter. I look forward to hearing from you soon.

Very truly yours,

Andrew T. Thomasson, Esq.

Encl:stated

Via ECF Filing (w/o encl.) and Via FedEx (w/ encl.)

cc: Abraham Kleinman, Esq. via ECF Filing Only